

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al.

Plaintiffs

v.

CROWLEY TOWING AND  
TRANSPORTATION CO., et al.

Defendants

Civil 97-2437 (GG)  
97-1548 (GG)

**MOTION REITERATING THAT UNDERSIGNED COUNSEL ARE NOT THE LEGAL  
REPRESENTATIVES OF THE SEAFARERS INTERNATIONAL UNION OF NORTH  
AMERICA, ATLANTIC, GULF, LAKES AND INLAND WATERS DISTRICT, AFL-  
CIO**

**TO THE HONORABLE COURT:**

**NOW COME** the undersigned counsel and very respectfully  
**STATE** and **PRAY** as follows:

1. On this same date, the undersigned counsel was noticed with copy of an Order scheduling a settlement conference for November 16, 2004 and the jury trial for February 25, 2005.

2. As it appears from the Docket No. 96, of May 8, 2001, the undersigned counsels filed a Motion to Withdraw as counsel of the SIU. Said Motion was granted on May 10, 2001, Docket Number 97.

3. Pursuant to Docket Entry 98, Attorney Ana R. Biascoechea, entered her appearance on behalf of the Seafarers International Union, which was granted on July 20, 2001 (Docket Entry 99), of this Honorable Court.

4. Subsequent to the above, the undersigned counsels have continued to receive notices and documents in the instant proceedings.

**IN VIEW OF THE ABOVE** it is very respectfully requested from this Honorable Court that the name of the undersigned counsel and the law firm, be eliminated from the record of this case, so that no further notices or documents are notified to the undersigned.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, this 13<sup>TH</sup> day of October 2004.

**s/ Miguel Simonet Sierra**  
**MIGUEL SIMONET SIERRA**  
Attorney Bar Number: 210102  
Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on October 13<sup>th</sup>, 2004, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

1. Jose L. Suárez Villafaña, Esq.  
**Jiménez, Graffam & Lausell**  
P.O. Box 366104  
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2. Luis A. Suárez Zayas, Esq.  
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San Juan, PR 00915
3. J.H. Zidell, Esq.  
300 71<sup>st</sup> Street #605  
Miami Beach, FL 33141

At San Juan, Puerto Rico, on October 13<sup>th</sup>, 2004.

**s/ Miguel Simonet Sierra**  
Attorney Bar Number: 210102  
Attorney for (Defendant)  
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